
Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

In the Matter of)
)
TELECOMMUNICATIONS RELAY SERVICES AND) CG Docket No. 03-123
SPEECH-TO SPEECH SERVICES FOR INDIVIDUALS)
WITH HEARING AND SPEECH DISABILITIES)
)

To: The Commission

COMMENTS ON NOTICE OF PROPOSED RULE MAKING

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Summary

Hands On Video Relay Services, Inc. (“HOVRS”) generally supports the proposals set forth in the Notice of Proposed Rulemaking. Those proposals promise to promote the goals of Section 225 of the Communications Act to provide deaf and hard of hearing persons functionally equivalent service to that available to the hearing community.

HOVRS particularly supports the Commission’s proposal for federal certification of interstate TRS providers. The current practice the Commission is following of requiring affiliation with a state program appears contrary to both Section 225 and FCC Rule Section 64.604. Moreover, the states have no incentive or interest in ensuring compliance by interstate TRS providers since they are not responsible for payment of interstate service. Lastly, federal certification will promote innovation in service and help reduce the cost of interstate TRS services.

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Speech-to-Speech Services for Individuals)	
with Hearing and Speech Disabilities)	

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Hands On Video Relay Service, Inc. (“HOVRS”), by its counsel and pursuant to FCC Rule §1.401, submits its comments on the Notice of Proposed Rule Making in CG Docket 03-123. *See* FCC 03-112 (June 17, 2003) (hereinafter “NPRM”). In support, the following is shown.

Introduction.

The NPRM seeks comment in 13 areas. They are: (1) Whether TRS facilities should have priority for restoration in the event of an emergency; (2) whether IP Relay calls should be provided using encryption or alternative security measures; (3) how best to mandate routing of wireless calls to the appropriate Public Safety Answering Point (“PSAP”); (4) whether VRS providers should be compensated for provision of non-shared language service, for example, translation of American Sign Language (“ASL”) to Spanish; (5) the appropriate speed of answer criteria for VRS calls and how to minimize set-up time; (6) whether to mandate communication access real-time translation (“CART”) for TRS calls to improve the pace of conversation; (7) how and whether to provide interrupt functionality on TRS calls; (8) the potential application of anonymous call rejection, call screening, preferred call-forwarding and talking return call to TRS calls; (9) whether to require speech recognition technology for TRS; (10) whether improved transmission speed for the TTY leg

of calls is technically feasible; (11) the use of innovative non-proprietary protocols for TTYs; (12) the kind of additional outreach TRS providers should provide, the role of federal funding in this regard, including whether states should be required to reimburse intrastate providers for outreach and the role of the Interstate TRS Fund in compensating TRS providers for outreach efforts; and (13) what procedures the Commission should establish to allow reimbursement of providers of solely interstate TRS service and whether the Commission should establish certification procedures for all TRS providers drawing from the Interstate TRS Fund.

At this time, HOVRS is a provider of VRS services only. Accordingly, HOVRS will comment only on those issues affecting or potentially affecting VRS.

1. TRS Facilities Should Enjoy Priority in Restoration Following an Emergency.

It should require little discussion to conclude that all TRS facilities should enjoy priority of restoration in an emergency equal to other elements of the communications infrastructure. As the NPRM points out, priority is given to those services necessary to respond to and manage any event or crisis that could cause public harm. NPRM at para. 104. Restoration of communications services is plainly necessary for safety of life and property. That is equally so for the communications services directly serving the deaf and hard of hearing community such as all forms of TRS. TRS is necessary for deaf and hard of hearing persons to make emergency communications. Those communications cannot be made over the telecommunications facilities serving the general public. Accordingly, TRS facilities should be given priority on par with other telecommunications services. This priority should include IP-Relay and VRS facilities as well. Although, IP-Relay and VRS providers have been granted waivers of the TRS requirement for immediate routing to the

appropriate PSAP, that waiver is intended to be temporary. Moreover, IP-Relay and VRS nevertheless regularly handle emergency calls, and can be expected to handle substantial amounts of traffic related to an emergency. VRS in particular must be expected to handle emergency traffic from those persons lacking adequate typing skills. Failure to give VRS providers priority in restoration is likely to deny emergency communications to a substantial portion of the deaf and hard of hearing community.

2. Encryption.

Privacy of TRS communications is a critical component of functionally equivalent service. Accordingly, HOVRS supports encryption of all Internet protocol TRS Services.

3. Wireless Call Routing.

Wireless TRS is in its infancy. Recognition of this fact is necessary in the treatment of emergency call routing for wireless TRS. It is HOVRS's position that the Phase 1 and Phase II E911 rules should be applicable to wireless TRS with at best a temporary waiver of no more than a few years. There is no reason why the same technology applicable to cellular, PCS and 3G spectrum should not apply to TRS calls made over cellular, PCS and 3G spectrum. This is true even if a call is IP-Relay or VRS. Whatever technology is used to locate a wireless voice caller should be equally able to locate an IP-Relay or VRS caller using a wireless device to access licensed spectrum such as cellular, PCS or 3G. Different issues apply to "local" wireless networks which are unlicensed. Application of Phase I and Phase II E911 rules to those networks is not cost justified and would likely stymie wireless TRS development.

4. Non-Shared Language Translation.

HOVRS takes no position on the provision of non-shared language translation for text-based TRS. In the VRS context, however, the “non-shared” language issue is a red herring. ASL is a separate language. It is the natural language of those deaf and hard of hearing persons who use it as their primary means of communication. It is not English, it is not Spanish. It is not French. It is ASL. For VRS, then, there is no shared language. It is vitally important that VRS providers be able to transliterate ASL to Spanish. Although English is the primary language spoken in the United States, Spanish is a strong second. As the NPRM points out (at note 343) there are more than 7,000 deaf children from Spanish speaking households in the United States. For many of them, ASL is their first and only language. These children should be entitled to communicate with their parents and other Spanish speakers via VRS. In this country Spanish sign language is simply not used.

5. Speed of Answer.

The speed of answer criteria for TRS calls is 85 percent within 10 seconds. HOVRS has been providing VRS for compensation for some 10 months. Prior to the promulgation of an interim VRS compensation rate of \$7.751, HOVRS found its average speed of answer decreasing every month, but not meeting the 85/10 standard. From HOVRS’s experience, achievement of 10 second/85 percent speed of answer is possible if a sufficient number of VRS communications assistants (“CA”) are available. That, in turn, requires that a sufficient number of interpreters be available and that VRS providers be able to pay for them. Both of these factors are problematic at the present interim rate. At some price, the law of supply and demand will provide a sufficient number of interpreters. However, at the current VRS “interim” compensation rate, VRS providers

neither can pay video CAs sufficiently, nor attract a sufficient number of interpreters to provide a 10/85 grade of service. The real question here is what grade of service is considered sufficient to meet the functional equivalence standard. For hearing persons the telephone network is set to provide an immediate dial tone 99 percent of the time and also to deliver a call to the called person's telephone line 99 percent of the time. By contrast, merely requiring 85 percent of calls to be answered within 10 seconds is a dismal quality of service standard. Perhaps for cost considerations, the Commission should relax the service grade even further. Should it do so, however, it should be under no illusion that it is providing the deaf and hard of hearing community with a comparable grade of service. In HOVRS's view, the VRS grade of service standard should be no worse than 90 percent of calls answered within 15 seconds. In fact, however, to approach the grade of service offered the hearing community, the standard should be 95 percent of calls answered within 10 seconds.

6. CART.

HOVRS takes no position on CART technology. It notes, however, that one of the major problems with TRS text calls is the time it takes to effect communication. Thus, HOVRS encourages any technology which improves the pace and effectiveness of communication.

7. Interruption.

VRS provides the opportunity for interruption so HOVRS takes no position otherwise with respect to this issue.

8. Anonymous Call Rejection, Call Screening, Preferred Call Forwarding and Talking Return Calls.

With respect to VRS, it is HOVRS's position that provision of these services are technologically feasible and may be provided, but may require the writing of specialized software.

As long as the Commission allows providers to recoup the cost of provision of these services, and allows a sufficient time to phase them in, e.g., one to two years, then HOVRS supports inclusion of these services as part of TRS minimum service.

9. Speech Recognition.

The Commission has approved speech recognition technology as a component of VRS. The issue is whether to require TRS providers to incorporate speech recognition technology, however.

Speech recognition is not an issue with respect to VRS. Accordingly, HOVRS takes no position with respect to whether it should be a mandatory component of TRS.

10. Improved Transmission Speed for TTY Calls.

Since TTY is not a component of VRS, HOVRS takes no position on this issue.

11. Innovative Protocols for TTYs.

Again, since TTYs are not a component of VRS, HOVRS takes no position on this matter.

12. Outreach.

Outreach is a matter vitally important to TRS achieving its goal of providing functionally equivalent communications service to the deaf and hard of hearing community. There are several elements to an effective outreach program. First, outreach is necessary to ensure the deaf and hard of hearing community has a basic awareness of the availability of TRS service. This requires advertising in publications and media serving deaf and hard of hearing persons, liaison with

educational institutions serving deaf and hard of hearing persons, appearances at events of particular interest to the deaf community, and other efforts designed to reach this particular segment of the population.

Second, outreach is necessary to ensure that hearing persons understand TRS and know what to do when they receive or initiate a TRS call. This requires targeting the hearing population. It is most appropriately accomplished via telecommunications companies' billing inserts, advertising in directories, and through media and public relations efforts of all parties concerned, including the Commission, the states, NECA and TRS providers and the telecommunications industry in general. In this connection the requirements of FCC Rule Section 64.604(c)(3) would appear a good start. Additional efforts beyond Section 64.604(c)(3), however, appear necessary to minimize hangups on TRS calls. Outreach to the hearing community is also necessary to publicize the procedure to reach deaf and hard of hearing persons via TRS.

Third, outreach is necessary to ensure the availability of TRS service to deaf and hard of hearing persons needing the service. This outreach effort, rather than being information driven, is more driven by the availability of specialized equipment and service to those deaf and hard of hearing persons needing them. For example, with respect to VRS, the availability of the service is dependant on the user having a suitable computer equipped with a video card, video camera, up-to-date operating system and a suitable broadband connection. That amounts to approximately \$1,000 worth of equipment and approximately a \$30-60 minimum monthly connection charge on top of a standard telephone line of \$15-20 a month to do full motion video over the internet. The fact is, however, that this is a lot for most people to afford simply to be able to telecommunicate with the

outside world. Equivalent service for a hearing person requires but an inexpensive telephone and \$15-20 monthly service. Adequate outreach in this circumstance requires that deaf and hard of hearing persons be afforded some assistance in terms of equipment and service. This is particularly necessary considering the significant (60 - 75%) unemployment and underemployment of deaf and hard of hearing persons. Provision of equipment and/or service to those persons who may need it would significantly enhance their employability and more than make up for the cost in terms of enhanced economic activity.

The question of how best to pay for outreach raises interesting questions. It is HOVRS's view that TRS providers are best able to judge where and how to allocate expenditures for outreach. Assuming that it is in the providers' best interest to increase TRS traffic and that this serves the salutary purpose of increasing availability of TRS to the deaf and hard of hearing community, it follows that TRS providers will target their outreach expenses to have the maximum effect on demand. To be sure, that position is susceptible to the argument that providers may be tempted to overspend on outreach without some Commission imposed limitation since the TRS funding mechanism relies upon providers' expense estimates without detailed review of those expenses. Thus the effect of excessive outreach efforts would be to unnecessarily drive up the compensation rate for TRS. However, this criticism would be applicable to any TRS expense category. Both NECA and the FCC have the power to audit provider expenditures to ensure they are not imprudent or excessive, and the FCC is certainly taking a close look at VRS expenses. Where expenditures are grossly out of proportion to other providers, it may serve as a basis for a closer look. However, merely because different providers may emphasize different areas of operation does not mean that

any such expenditures are improper or imprudent. Perhaps the Commission could handle any concern in this area by providing that expenditures for outreach for interstate TRS that exceed a certain percent of a TRS provider's estimated expenses would not be reimbursable from the Interstate TRS Fund.

The alternatives to provider outreach are all unpalatable. Neither the Commission nor NECA is better situated to determine appropriate outreach efforts than the providers of TRS service. Nor should outreach be entirely left to the state programs. Certainly the states have a substantial role in outreach. However, at least at this point the state programs have no financial stake in either IP-Relay or VRS. It is therefore not realistic to expect the states to pay substantial attention to either of these programs.¹ The Commission seeks comment on whether states should have the obligation

¹ The Commission seeks comment on whether states should have the obligation to reimburse intrastate TRS providers for any additional outreach requirement adopted in this proceeding. NPRM at para. 131. This presents an interesting question of federalism. Neither the Commission nor the Congress in the exercise of the commerce power has the authority to force a state to spend money. *See Printz v. United States*, 117 S.Ct. 2365 (1997). It would appear then that the only leverage the Commission has over the states vis-a-vis TRS is its ability to certify the state TRS programs. Thus, the Commission may make it a condition of certifying state programs that the states reimburse intrastate TRS providers for their outreach efforts, but it has no authority to require that they do so. That being said, a requirement that a state program include adequate outreach efforts, however, those efforts may be compensated, would appear both reasonable and

to reimburse intrastate TRS providers for any additional outreach requirement adopted in this proceeding.

Nor is the Commission particularly suited for outreach. Its job is regulation, not advertising or public relations. Besides, spending taxpayers' money on promoting the TRS appears at odds with the provisions of Section 225 of the Act which requires the cost of providing interstate TRS shall be assessed on the subscribers of interstate service. 47 U.S.C. §225(d)(3)(B).

There certainly should be a role for the TRS Advisory Council, especially in coordinating a nationwide outreach effort. However, the bulk of outreach efforts should be left to the providers, which have the greatest stake in widespread acceptance and use of TRS.

13. Procedures for Determining Eligibility for Receiving Payments from the Interstate TRS Fund.

necessary to the success of TRS.

The Commission seeks comment on its procedures for determining eligibility for reimbursement from the Interstate TRS Fund. It seeks comment on whether it should amend its rules to provide for certification of entities drawing solely from the Interstate TRS Fund, for example, providers of IP-Relay and VRS. The NPRM recites that the rules currently do not contemplate a situation where an entity not affiliated with a state TRS program seeks to draw from the Interstate TRS Fund as a result of provision of IP-Relay or VRS. *See* NPRM at para. 136. The NPRM states that because “no federal certification program” exists, interstate TRS providers may seek reimbursement from the Interstate TRS Fund only after they have shown that they are an approved provider in a state TRS program that has been certified by the Commission.”² The Commission is therefore proposing a process which would require interstate TRS providers to apply to the Commission for certification and provide evidence that they are in compliance with the mandatory minimum standards of FCC Rule Section 64.604. Interstate TRS providers would be

² With all due respect, the NPRM’s interpretation of the Commission’s rules concerning eligibility to draw from the Interstate TRS Fund, which cites no authority for its interpretation, is in error. FCC Rule Section 64.604(c)(5)(F) states that TRS providers are eligible to draw from the Interstate TRS Fund if they are (1) operated under contract with and/or by certified state TRS programs; (2) owned by or operated under contract with a common carrier providing interstate services; or (3) interstate common carriers offering TRS pursuant to the rules. All that is necessary to be an interstate common carrier is to provide interstate service on a common carrier basis. Since interstate TRS service is required under Section 64.604 to be offered on a common carrier basis, the provision of interstate TRS pursuant to Section 64.604 qualifies an entity to draw from the Interstate TRS Fund. Moreover, FCC Rule Section 63.01 provides blanket Section 214 certification to domestic common carriers, obviating any express certification requirement or procedure. The proof of this is the fact that the Commission authorized Publix Network Corp. and its affiliates to provide TRS (prior to Rule Section 63.01 becoming effective). The real problem here is that the Commission believes it should have in place a certification procedure to minimize the possibility of another Publix situation. HOVRS does not disagree that this may be a good idea. It just is not what the rules presently say, however.

required to keep a log of complaints received and their disposition of such complaints. They would be required to submit a report each year detailing their compliance with the minimum standards of FCC Rule Section 64.604 and listing the resolution of each complaint filed against the provider. Failure to meet these requirements would be grounds for revocation. The Commission is also seeking comment on whether all interstate TRS providers should be subject to the certification requirement.

HOVRS favors a uniform federal certification process. Under that process all entities receiving funds from the Interstate TRS Fund would be required to obtain and maintain certification of compliance with FCC Rule Section 64.604. The process the Commission now apparently follows of requiring participation in state certified programs appears contrary to Section 225's express provisions because it relies upon and assumes state participation in the TRS program. Although in practice every state in the Union participates in the TRS program, Section 225 does not require them to do so and fundamental concepts of federalism would prohibit Congress from doing so if Congress had sought to do so. Rather, state participation is voluntary. *See* 47 C.F.R. §225((f)(1). If states choose not to participate or a state program's certification is suspended or revoked, Section 225 requires the Commission to "take such steps as may be necessary, consistent with this section, to ensure continuity of telecommunications relay services." 47 U.S.C. § 225(f)(4). Indeed Section 225((b)(1) expressly provides that "the Commission shall ensure that interstate and intrastate telecommunications relay services are available, to the extent possible and in the most efficient manner, to hearing-impaired and speech-impaired individuals in the United States." Thus, reliance

on state programs to pass on the service offered by interstate TRS providers contravenes the Commission's obligations under Section 225.

HOVRS strongly favors a process which would promote provision of Interstate TRS services, including VRS, by entities not necessarily affiliated with a state plan. Aside from the fact that the Commission's current rules plainly contemplate such service, the public would plainly benefit from that service.

First, it would promote service competition and innovation in TRS services. The Commission can take notice that with the recent increase in VRS providers, there has been increased emphasis on outreach efforts, video quality, and provision of enhanced services such as "video voice mail." Second, direct certification by the Commission of VRS providers is likely to decrease the cost of service by allowing the providers actually delivering the service to bill the Interstate TRS Fund directly. Third, it is contrary to logic to expect states to supervise adequately interstate TRS providers when the states are not responsible for their compensation. Moreover, the constitutional authority for state regulation of an interstate provider is highly questionable.

HOVRS supports the proposed rules governing certification of interstate TRS providers with two exceptions. First, the certification period should be five years rather than one year. This is similar to the five year period for state TRS program certification. Recertification for period of less than five years is unnecessary given the requirement for yearly reporting and the Commission's authority to require submission of documentation demonstrating compliance with the rules at any time. In light of this authority the cost in terms of private and public resources does not justify any marginal compliance benefit that might arise.

Second, those TRS providers who demonstrate that they have been providing service in excess of a year either on their own, through contracts with common carriers drawing from the Interstate TRS Fund, or through contracts with certified state TRS programs should in the absence of a substantial and material question of fact or law arising from their certification applications and comments thereon be presumed to be meeting the requirements of FCC Rule Section 64.604, and should thus receive certification 45 days following public notice of the filing of their certification applications. The rationale for this provision is simple. These entities will have a history of operation and compliance with the Commission's rules. In addition the public will have had experience in use of their service and the opportunity to file complaints concerning any deficiencies in that service. As a result of that operational history, the Commission will be in the position to have confidence in these entities' compliance with the provisions of FCC Rule Section 64.604. It need not expend scarce resources flyspecking a certification application under these circumstances.

Conclusion.

The proposals in the NPRM represent another step forward for the TRS program and the ultimate goal of functional equivalent service for the deaf and hard of hearing community. HOVRS urges the Commission to promptly adopt the proposed changes to its rules supported herein.

Respectfully submitted,

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Certificate of Service

I, Funmi Feyide, do hereby certify that copies of the foregoing Comments on Notice of Proposed Rule Making were sent on this 24th day of September, 2003, via first-class mail, except where noted, postage pre-paid, to the following:

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